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**BY ECF**

The Honorable Paul A. Engelmayer  
United States District Judge  
40 Foley Square  
New York, New York 10007

Re: *Naquan Cintron v. City of New York, et al.*, 24 CV 06602 (PAE)

Dear Judge Engelmayer:

I represent the plaintiff in the above-referenced civil rights action. I write in response to defendants' motion to compel production of a Section 160.50 release. *See* ECF Doc. 12. As argued below, defendants' motion should be denied in its entirety based on their failure to properly meet and confer, as well as due to the issue now being moot.

As an initial matter, plaintiff was in the process of obtaining the relevant authorization when defendants filed their motion without any meet and confer as required by Your Honor's Individual Practices as a condition precedent to filing such a motion. Specifically, there was no effort whatsoever by defense counsel to meet in person or by telephone with the undersigned prior to moving, as required by Rule 2(C) of the Court's Individual Practices.

Plaintiff has since provided the authorization at issue to defense counsel and asked defense counsel to withdraw forthwith the unnecessary and otherwise premature motion given the failure to comply with Your Honor's Individual Practices, and in light of there being no issue in dispute as defendants now have the release in question.

Surprisingly, defense counsel declined to withdraw his motion, leaving us with no choice but to respectfully request that the Court deny defendants' motion in its entirety, and that it grant such other and further relief to the plaintiff that the Court deems appropriate.

Thank you for your consideration.

Respectfully,

*Brett Klein*

Brett H. Klein

cc: John Schemitsch, Esq.